MICHAEL PAULS ASSOCIATES

6475 E Pacific Coast Hwy #135, Long Beach, California 90803 (562) 434 - 2835 fax (562) 434 - 4301

August 3, 2011

Mr. Sorin Alexanian
Deputy Director, Current Planning Division
Department of Regional Planning
320 W Temple St.
Los Angeles CA 90012

RE: 1104 S. Hacienda Blvd, Hacienda Heights

Dear Mr. Alexanian:

Goodwill, Southern California has expressed interest in a potential retail store site located in the community of Hacienda Heights at the northeast corner of Hacienda Heights Boulevard and Gale Avenue in Los Angeles County. The zoning for the potential site is C-2 Commercial in the County Zoning Code.

The subject unit within the shopping center consists of approximately 10,000 s.f. of which approximately 2,500 s.f. will be utilized for donation and retail support.

In the recent past, Goodwill has been offered properties for lease in commercial zoning districts in unincorporated Los Angeles County (other than C-3 zones which allows the sale of second hand goods), only to be denied the opportunity to establish a business because of strict zoning limitations excluding second hand sales.

Goodwill operates its second hand retail stores in a manner equal to national discount retail store chains such as Ross, TJ Max and Marshalls. These discount retailers are complementary to Goodwill retail stores in relation to interior appearance, fixtures, façade, signage as well as the retail operation of the business inclusive of marketing and merchandise display techniques.

Goodwill would significantly benefit by being allowed to establish retail stores in commercial shopping centers where national discount retailers are permitted. Currently, County Code prohibits the sale of second hand goods in most Commercial Zones placing Goodwill in a disadvantaged position to compete for customers in most commercial shopping centers.

Goodwill Southern California (GSC) was established in 1916 in Los Angeles and is a 501(c) (3) non-profit charitable organization whose mission is to enhance the quality of the lives of people who have disabilities or other vocational disadvantages and assist them to become productive and self-sufficient through education, training, work experience and career opportunities in the community.

Goodwill funds its efforts in providing job development services thru profits derived from its retail operations. In 2010, GSC helped more than 92,000 people with job training, education and placement programs.

Goodwill Southern California operates 65 retail stores, 46 attended donation centers, three multi- service campuses, three WorkSource centers and is affiliated with 24 job service centers in the Southern California area.

We would like to ask that the County of Los Angeles consider a Code Amendment to allow Goodwill Southern California be permitted to establish second hand retail stores/ donation centers in C-2 and similar Commercial Zones in Los Angeles County in order to better serve its customers as well as benefit from complementary business relationships with other national retail discount store chains.

Currently, other Cities in Southern California have classified Goodwill as a charitable or non-profit organization in order to allow GSC to establish a retail presence in Commercial Zones. We are herein providing examples of Zoning Codes for the City of Palm Springs, San Bernardino and Pasadena.

City of Palm Springs, Section 92.12 of the City's Zoning Code allows second hand sales as a permitted use in the City's Commercial zones if operated by a charitable organization.

City of San Bernardino, Section 19.06.025.D1 of the City's Zoning Code allows second hand stores as a permitted retail use in all Commercial Districts if operated by a non-profit charitable organization recognized by the State of California.

City of Pasadena, Section 17.24.030 of the City's Zoning Code conditionally permits philanthropic charitable organizations in most Commercial Districts. The sales of used clothing is considered retail by definition and permitted in Commercial Zones.

I hope that this information proves helpful and we look forward to discussing our request further in meeting with you and your staff at a later date.

If you have any questions or need additional information, please do not hesitate to contact my office at (562) 434-2835.

Sincerely,

Michael Pauls

Cc: Mark Einbund